

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 7

11201 Renner Boulevard Lenexa, Kansas 66219

0 5 MAY 2015

MEMORANDUM

SUBJECT:

Financial Assurance Review

Financial Test / Corporate Guarantee - 2015

Guarantor:

Occidental Petroleum Corporation

Los Angeles, CA 90024

Owner/operator:

Occidental Chemical Corporation

Dallas, TX 75244

Facility:

6200 South Ridge Road

Wichita, KS 67215

EPA ID No. KSD 007482029

FROM:

Michael Lancaster

Financial Analyst - SEE Grantee

AWMD/WEMM

TO:

Brad Roberts

Project Manager AWMD/WRAP

RCRA

FINDINGS:

The facility is in compliance with the financial assurance criteria as specified in 40 CFR Parts 264 and 265.

Specifically:

- 1. The current corrective action cost estimate amount (\$4,421,211) was properly adjusted for inflation by an inflation factor of 1.015, in accordance with 40 CFR 264.142(b) and 265.142(b).
- 2. The Guarantor passes the Corporate Guarantee Financial Test, Alternate II and satisfies the requirements of 40 CFR 264.143(f) and 265.143(e).
- 3. The wording of the March 27, 2015 Letter from the Chief Financial Officer and the Corporate Guarantee has been modified as directed by the EPA to include reference to corrective action.

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